

Civil No.: 21-15031

NOTICE OF JOINT MOTION FOR ENTRY OF CONSENT DECREE

Please take notice that Plaintiff, United States of America, and Defendants, the State of New Jersey (State) and the New Jersey Department of Corrections (NJDOC), (collectively, “the Parties”) hereby jointly and respectfully request that this Court enter the attached Agreement as an order of the Court. *See* Attachment 1. In support of this motion, the Parties submit the accompanying Memorandum in Support of Joint Motion for Entry of Proposed Consent Decree and Proposed Order. *See* Attachments 2 and 3.

Dated this 10th day of August, 2021

Respectfully submitted,

COUNSEL FOR PLAINTIFF, UNITED STATES OF AMERICA:

RACHAEL A. HONIG
Acting United States Attorney
District of New Jersey

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

s/Michael E. Campion
MICHAEL E. CAMPION
Chief, Civil Rights Unit
Civil Division
970 Broad Street, Suite 700
Newark, NJ 07102
973-645-3141
Michael.Campion@usdoj.gov

s/Steven H. Rosenbaum
STEVEN H. ROSENBAUM
Chief
Special Litigation Section

s/Kerry Krentler Dean
KERRY KRENTLER DEAN
Deputy Chief
Special Litigation Section

s/Kelly Horan Florio
KELLY HORAN FLORIO
Assistant United States Attorney
Civil Rights Unit
970 Broad Street, Suite 700
Newark, NJ 07102
(973) 645-2824
Kelly.Horan@usdoj.gov

s/Helen Vera
HELEN VERA
Attorney
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530

COUNSEL FOR DEFENDANTS, STATE OF NEW JERSEY AND NJDOC:

/s A. Matthew Boxer
A. Matthew Boxer
Lowenstein Sandler LLP
One Lowenstein Drive
Roseland, NJ 07068
973-597-2500
mboxer@lowenstein.com